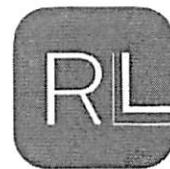


The Law Office of Ryan Lozar, P.C.
305 Broadway, 10th Floor, New York, NY 10007
Tel: (310) 867-1562; Alternate Tel: (646) 666-8262; Fax 1-877-666-4456
ryanlozar@gmail.com
www.ryanlozar.com/www.luchaportusderechos.com



OCTOBER 19, 2016

Re: Williams v. City of N.Y. et al., No. 16 Civ. 233 (JPO)

Dear Ms. Byrns:

I represent Plaintiff Rhonda Williams in the above-captioned Section 1983 police misconduct litigation which recently resulted in a Rule 68 Offer and related Judgment. As you know, the Court granted the consent motion to extend time for the Parties to resolve their fee dispute, or for Plaintiff to file a motion, until October 31, 2016.

My timesheet is attached. As a result of our recent conversation, you will notice three changes: (1) I attributed the civil cover sheet entry to a paralegal rate; (2) I reduced the time relating to review of initial discovery; and (3) I took out the time I spent counseling my client with respect to the FRCP 68 offer. Changes that you will not see, although the City contends that they should be made, include: (1) the time I spent reviewing the roughly ninety pages of supplemental plan discovery; (2) the time I spent drafting Plaintiff's tailored DRI's; and (3) the time I spent drafting Plaintiff's First Amended Complaint. I dispute that any of these latter three suggested changes are appropriate because they represent actual services rendered, thus actual fees incurred.

As you know from our telephone conversation, Plaintiff is willing to settle the Parties' fees dispute for \$9,200.00. With this letter, Plaintiff formally reiterates that demand, the reasonableness of which she believes is amply shown by the fact that it represents a roughly 11.5% downward departure from her actual, reasonable fees and costs totaling \$10,396.30.

Thank you for your time. I am happy to provide additional information upon request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Lozar', with a long, sweeping horizontal line extending to the right.

Ryan Lozar
Attorney for Plaintiff Rhonda Williams